

Cultural Resources Issues and Policies

Summary

Our region's rich history, dating back to the prehistoric Paleo-Indian, Archaic, Woodland, and Mississippian periods even before Spanish exploration in the 1500s and English settlement of Charles Towne in 1670, is important to us for many reasons. Charleston quickly grew to become the largest city in the southern colonies and later United States, and remains a prominent national city today. The city and region contain numerous significant historic resources; these are very valuable to the regional community.

Preservation and interpretation of cultural (historic) resources are significant factors in the "quality of life" for a community. Continued quality of life is what makes growth sustainable over a long period of time. The proper management of cultural resources can be important attractors for tourists (in fact, tourism is a major aspect of our economy) and for movement of new residents into the area.

Historic resources are non-renewable; once they are lost they cannot be redeveloped for scientific study, heritage appreciation, or educational purposes. Programs to study, preserve, and interpret these resources have a necessary sense of urgency. Neglect reduces the resource base day by day and year by year. Watershed planning allows for the efficient management of these resources with the context of a program that covers all the uses of the estuary.

The Charleston Harbor watershed area has significant institutions and organizations which greatly contribute to the preservation and interpretation of cultural resources. These include the Historic Charleston Foundation, the Charleston Museum, the National Park Service, and the National Trust for Historic Preservation (Drayton Hall), as well as city, county, and state historic parks and private historic attractions. Historic resources are also protected by federal, state, and local laws and regulations. These laws require some consideration of historic cultural resources before permits for development or zoning changes are approved. This review process is reactive, however, and is not as comprehensive or as efficient as it could be. Development of a Cultural Resources Management Plan for the Charleston Harbor estuary would increase the efficiency of current review processes. Such a plan would enhance the ability of city, county, and local agency planners to participate in the preservation of cultural resources. The following is a list of cultural resources issues and policy recommendations to address those issues. These policies could produce dramatic contributions to preserving and interpreting our cultural resources.

Issue: City, County, and Other Local Agency Planners Can Greatly Enhance Cultural Resources Preservation and Interpretation.

Proposed Policy: City and County ordinances requiring consideration of cultural resources are valuable tools for monitoring and protecting these resources and should be encouraged.

Proposed Policy: City and County permittees and planners need training to make appropriate management decisions about cultural resources.

Proposed Policy: The S.C. Department of Archives and History should develop and coordinate workshops and seminars to educate local government planning staffs about cultural resources management.

Proposed Policy: Agencies need cultural resources data base information to support the decision making process. GIS is most efficient for this. A GIS should be developed which protects exact site locations. The GIS should be personal computer based.

Proposed Policy: Agencies involved in cultural resources management should provide funding for updated information gathering and distribution, on an ongoing basis.

Proposed Policy: Leadership for cultural resources management should remain at the state level (Department of Archives and History) due to staff expertise and experience, and to the ability to coordinate across municipal and county boundaries to ensure consistent assessment methods are applied.

Issue: Permitting Processes Are By Nature Reactive, Creating Efficiency Problems.

Proposed Policy: A Cultural Resources Management Plan for the watershed should be developed based on similar plans designed and in place for military bases and other federal lands.

Proposed Policy: The Plan should designate sensitivity areas based on the Department of Archives and History's knowledge of historic sites and with the assistance of the S.C. Institute of Archaeology and Anthropology. Use should be made of the predictive model for terrestrial sites and Tidewater Atlantic's document for submerged sites.

Proposed Policy: Plan development should begin with high sensitivity/high development potential areas and be extended throughout the watershed as funding allows.

Proposed Policy: The Plan should support ongoing programs to survey (in advance of specific development proposals) areas of high sensitivity and high potential for development.

Proposed Policy: The Plan should support and promote the development of local academic and scientific research projects and programs focused on the region's rich cultural heritage. Cultural resources management decisions should be coordinated with these programs for maximum

effectiveness.

Proposed Policy: Existing cultural resources management plans within the watershed (e.g., Naval Weapons Station, Francis Marion National Forest), should be identified and consulted in development of a watershed Plan.

Proposed Policy: Agencies involved in cultural resources management and in development within the watershed should contribute to the funding necessary to prepare a watershed Cultural Resources Management Plan.

Issue: Support for Cultural Resources Management Comes from an Educated Citizen Base.

Proposed Policy: Historic properties, including submerged sites, buildings, districts, landscapes, archaeological sites, and viewsheds should be targeted for interpretation and education programs.

Proposed Policy: Interpretation and education programs should be considered as part of the cultural resources management process. Such programs can be considered as mitigation of development impact, similar to scientific study and documentation.

Issue: Support for Cultural Resources Management Also Comes from Acceptance and Support by Permit Applicants.

Proposed Policy: Requirements for resource identification, preservation, and mitigation study should be evaluated for efficiency.

Proposed Policy: Cultural resources management requirements should be consistently applied to ensure fairness.

Proposed Policy: Requirements should be widely publicized to potential permit applicants. This should include development of an informational brochure for permit applicants and the general public.

GROWTH MANAGEMENT

Cultural Resources Issues

Introduction

Our region's rich history dates back to the Paleo-Indian, Archaic, Woodland, and Mississippian periods of Native Americans and continues through Spanish exploration in the 1500s and English settlement of Charles Towne in 1670. In Colonial times Charleston quickly grew to become the largest city in the South; its Revolutionary War and Antebellum history is nationally significant. Post-bellum and early twentieth century developments still have dramatic influences on the region. Numerous significant resources representing this rich history are present in Charleston and in the surrounding cities and rural areas of the watershed; these resources are very valuable to the regional community.

It is appropriate that issues and policies regarding cultural resources are considered by the Growth Management group. Preservation and interpretation of cultural resources are significant factors in the "quality of life" for a community; continued quality of life is what makes growth sustainable over a long period of time. In addition, cultural resources are directly important to growth; their preservation and interpretation are significant attractions for tourists and for movement of new residents into an area.

Cultural resources within the Charleston Harbor Project area are important to growth and quality of life in the following ways:

The historic resources of the Charleston Harbor watershed form the key factor in the highly significant tourist industry. While scenic views and beach/ocean recreation are very important attractors, historic resources differentiate Charleston from other coastal cities. These resources include not only the historic buildings in the heart of Charleston, but also the Charleston Museum (and its programs) and the area's historic parks (e.g., Charles Town Landing, Fort Sumter, Fort Moultrie, Drayton Hall). Archaeological resources of the area well complement the historic buildings; archaeological components are of strong interest at each park listed above and are important elements of the Charleston Museum programs.

Residents of the watershed area may not realize the economic importance of these historic resources. Over 200,000 persons annually visit Fort Sumter, putting an average of \$150 each into the regional economy per year. Fort Sumter thus contributes directly more than \$30 million to the region. Recent estimates indicate that the major historic parks and museums attract about 1.5 million visits per year. Clearly, these resources are directly important to the region's economy.

Historic and archaeological properties, in addition to being tourist attractions, provide strong community values. Historic areas, properly interpreted and developed, provide public spaces that are significant references and definitions of a community; in this way historic resources foster a sense of community and shared citizenship.

Historic resources (including archaeological components) are also educational resources which help people understand their heritage and their roots, and the heritages of other groups in our society. This may be especially significant for helping our pluralistic society understand the historical importance of various groups (e.g., African Americans, Native Americans) in the region, state, and nation.

Historic resources are non-renewable. Once buildings and structures are demolished, and once archaeological sites are destroyed, they cannot be redeveloped for scientific study, for heritage appreciation, or for educational purposes. Programs to study, preserve, and interpret historic resources thus have a necessary sense of urgency. Neglect reduces the resource base day by day and year by year.

Existing programs to study, preserve, and interpret historic resources in the Charleston Harbor Project area have been developed over time and have produced outstanding results. The federal parks (Fort Sumter, Fort Moultrie, and the Pinckney Site) are excellent examples of appropriate preservation and interpretation of significant events and elements of the region's history. Similarly, the state's Charles Town Landing park interprets the first settlement by Europeans in the region, and Fort Dorchester, Santee Canal, and Hampton Place State Parks have preserved important ruins, buildings, and archaeological deposits.

The Charleston Museum is an outstanding historic and heritage education institution; its archaeological programs are excellent and stimulate great public interest. The City of Charleston has preserved a number of historic houses and public buildings which contribute strongly to the region's resource base. Charleston city parks, especially the Battery area, Marion Square, Colonial Lake, and the new Waterfront park (with views of the historic harbor area and with historic signage) are excellent historic public spaces providing not only a sense of community, but a feeling of continuity with the region's history.

Private organizations have been the leaders in much of the preservation and enhancement of the region's historic resources. The Historic Charleston Foundation led the way in preservation of the historic homes in the city and has long served as an effective policy setter for historic preservation in the region. Historic plantations in the Harbor area have been preserved and interpreted by local and national private organizations: Drayton Hall, Magnolia Plantation, Middleton Place, and Boone Hall. Many other private organizations and individuals have made significant contributions to preservation efforts, both directly and by influencing governmental action on the local, state, and federal levels.

Cultural Resources Management

An important aspect of historic preservation was developed during the 1960s; this involves consideration of cultural resources in a formal manner before governmental construction or development projects (e.g., road construction, dredging, or dam construction). Such consideration is also necessary for a private undertaking if such a project involves a government permit, certification, license, grant, or zoning change. This consideration of historic properties, usually called cultural resources management, is part of the general environmental impact assessment movement.

Cultural resources management began at the federal level in the 1960s and 1970s, and is now being included in state and local project planning. A few counties and cities/towns have developed historic preservation ordinances (or other rules) which mandate identification of cultural resources that might be affected by a proposed private development project. The S.C. Office of Ocean and Coastal Resource Management (OCRM) has been a leader in considering cultural resources before certifying or permitting private development projects. OCRM has worked closely with the S.C. Department of Archives and History to review proposed projects and to preserve significant historic properties and their information before these are destroyed by construction.

The cultural resources management process for projects reviewed by OCRM is similar to that which has been developed by federal agencies. When OCRM is asked to certify or permit a project, staff at OCRM study the application against information they have on hand. In considering cultural resources, OCRM works with the S.C. Department of Archives and History (DAH). DAH staff with expertise in archaeology and history help review the application; they check existing records for properties listed on the National Register of Historic Places, and they consider the likelihood of undiscovered archaeological sites and unrecorded historic buildings and structures.

If an historic property is known for the project area, OCRM may include a preservation stipulation in the certification or permit. Most often, the permit area has not been professionally examined for archaeological sites or historic buildings, and OCRM stipulates that an archaeological reconnaissance or an intensive survey be carried out by the project developer. If this survey locates significant archaeological sites or historic buildings, the permit applicant will be required by OCRM to preserve these sites or buildings or to mitigate damage to them by carefully recording information prior to construction. Typically, the developer will hire consulting archaeologists and historians to survey the project tract and to work with DAH and OCRM to prepare and implement a preservation/mitigation plan.

How well is this cultural resources management system working for the Charleston Harbor Project area? In many ways, the system has worked very well. Several thousand archaeological sites, cemeteries, and historic buildings have been identified during surveys. Using information from these surveys, archaeologists are understanding patterns of prehistoric Native American and early historic period settlement and lifeways in the Harbor area much better than 10 years ago when the system began to be implemented. Many significant archaeological sites have been preserved by developers--for example, as greenspace areas within developments. Archaeologists in the future, when study techniques are more sophisticated, may be able to examine these sites. Without such preservation, the sites would have been destroyed, and all their information lost.

Many other archaeological sites have been excavated and studied in detail as mitigation before construction. It is not always feasible to preserve an archaeological site within a development project. Often, careful excavation of a sample of the site to be impacted is carried out, with study information published and with artifacts and excavation records preserved for more detailed future study or restudy.

Buildings or other structures that cannot be saved as part of a development have been carefully recorded by scaled drawings and by photographs so that their stylistic and construction characteristics are preserved by documentation.

While there have been great contributions in the last 10 years of the OCRM process of cultural resources management, there are some shortcomings and some ways to improve the system.

Discussions of problems and proposed solutions presented below are organized as "issues" and "policies" to fit the overall organization of the Growth Management group statement. These policies could produce dramatic contributions to preserving and interpreting the watershed's cultural resources.

Issue: City, County, and Other Local Agency Planners Can Greatly Enhance Cultural Resources Preservation and Interpretation.

It is a sad fact that numerous important archaeological sites and historic buildings/structures are being lost each year to destruction from development and to decay from neglect. By and large, these resources are non-renewable--once lost, they are gone forever. A strong sense of urgency thus pervades archaeological and historic preservation.

New construction (growth, development) is the major threat to cultural resources. Only a portion of this new construction is reviewed under existing federal and state permitting; large amounts of private development activities are regulated only by county, city, and town zoning and other guidelines. Several counties, cities, and towns have realized in recent years not only that historic preservation can be a strong component of quality of life for their communities, but that state and federal action will not preserve adequately the historical resources that are locally important. These local governments (e.g., Beaufort County, Town of Hilton Head) have developed preservation ordinances and regulations so that historic resources can be considered when reviewing a project (e.g., for a zoning change or building permit).

These ordinances and regulations can make a tremendous contribution to the overall preservation effort without hindering continued economic growth and development. Such ordinances can fill some of the major gaps not covered by federal and state action. Importantly, such local involvement is part of a national trend for delegating authority and control to citizens "closest to the action." Certainly, local review of cultural resources management issues and concerns has the potential to be more concerned and careful with the resources important to the local community; federal and state agency reviews might not be as aware of locally significant resources. In summary, local review processes for cultural resources have several very important advantages: (1) they can greatly increase the amount of resources reviewed for preservation/study consideration; (2) they can exhibit more sensitivity to locally important resources, issues, or plans; and (3) they can help foster a stronger sense of community and local control.

Proposed Policy: City, Town, and County ordinances requiring consideration of cultural resources are valuable tools for monitoring and protecting these resources and should be encouraged.

Local regulation of cultural resources is not without problems, however. Counties and municipalities have few staff persons with cultural resources training or expertise, and these limited staff members are not placed in the appropriate planning agencies. Counties and municipalities with preservation ordinances currently depend on state agencies (particularly the S.C. Department of Archives and History) for technical expertise in deciding whether to require a survey, what sites/buildings are worthy of preservation or study, and what levels of mitigation or preservation are appropriate.

Adequate training is certainly feasible; there are a number of workshop-type models available

from federal agencies. Such workshops could be designed and implemented by the S.C. Department of Archives and History or by consultant teams.

Proposed Policy: Municipal and County permitters need training to make appropriate management decisions about cultural resources.

Proposed Policy: The S.C. Department of Archives and History should develop and coordinate workshops and seminars to educate local government planning staffs about cultural resources management.

In addition to training, municipal and county permitters need specific tools to allow effective decision making. Local review agencies also need efficient access to information regarding the spatial distribution of significant (known) cultural resources and of areas of high and low potential occurrence.

Access to such information is currently feasible through development of a Geographic Information System (GIS) data base. Such a system could be developed for personal computer use, with information presented in terms of high interest areas, and low interest areas. An appropriate management GIS can certainly be developed which will not disclose exact site locations (thus protecting sites from vandals).

Such a system can be developed utilizing already digitized topographic information, with filtering for resource management priorities based on already recorded resources and on the cultural predictive modeling already developed by the Charleston Harbor Project. The S.C. Department of Natural Resources has tremendous expertise and information available for such an undertaking and could work closely with OCRM and the Department of Archives and History to develop such a data base.

Policy: Agencies need GIS cultural resources data base information to support the decision making process. The GIS should be personal computer based and should protect exact site locations.

Development of such a data base is certainly feasible and should not necessarily be expensive. Data and expertise are available within the Charleston Harbor Project, OCRM, and the Department of Natural Resources. Recent software developments allow powerful GIS data manipulation using modern personal computers; including interacting with more powerful computer platforms as desired. Training in using this tool could be an important aspect of the workshops discussed above.

Policy: Leadership for cultural resources assessment and management should remain at the state level (Department of Archives and History) due to expertise, experience, and the ability to coordinate across municipal and county boundaries to ensure that generally adequate and consistent management methods are applied.

At the present time, cultural resources technical expertise and training is concentrated at the state level (at the Department of Archives and History). This agency has long familiarity with cultural resources issues and serves as coordinator for federal and state review processes. It should be

recognized that the Department of Archives and History should continue as a coordinator and leader as municipal and county review programs develop.

Issue: Permitting Processes Are by Nature Reactive, Creating Efficiency Problems.

Cultural resources management is necessarily reactive to a great degree. Management issues, including how much survey is adequate, which buildings and sites are significant, and how much preservation/mitigation is necessary, must be considered on a project by project basis. Importantly, costs for survey and for preservation/mitigation are borne on a project by project basis by the developers of each project.

Reactive processes have efficiency problems. Decisions made on a project by project basis, especially when they involve subjective issues and goals, are often inconsistent. Inconsistency can lead to a number of problems, including redundancy, neglect of important concerns, and, importantly, a sense of unfairness for those bearing the costs. Redundancy can be an especially significant problem; this can increase costs without increasing benefits.

Reactive processes can avoid major efficiency problems, however, with appropriate master planning. Such master planning has become more common in cultural resources management in the last few years. Federal agencies with land management responsibilities have long used master planning to increase efficiency of resource use and conservation. In recent years, these agencies have brought cultural resources within their overall planning operations.

In the Southeast, the largest two land managing federal agencies are the U.S. Forest Service and the Department of Defense. Both of these agencies have been developing long term plans to manage cultural resources within the land units they control.

For each of its installations, the U.S. Navy is developing Historic and Archaeological Resource Protection (HARP) plans; the Naval Weapons Station in Charleston has such a HARP plan. The U.S. Army, including the Corps of Engineers, is developing Historic Preservation Plans (HPPs) for its bases and operations (e.g., Fort Jackson, Russell Reservoir); the U.S. Air Force has similar plans (Cultural Resource Management Plans--CRMPs) in place or in development for its bases.

As an example, the HARP Plan for the U.S. Naval Weapons Station presented a five year program for identification and protection of historic and archaeological sites within the base. First, all buildings and structures were surveyed to determine if they were eligible for the National Register of Historic Places. The HARP Plan contains specific preservation requirements for buildings and structures identified as National Register eligible--while continuing active use and maintenance.

Similarly, the HARP Plan specified a program to survey the undeveloped lands at the Naval Weapons Station for archaeological sites. The first phase of this archaeological survey sampled the base to identify what kinds of sites could be expected and what topographical areas had high site occurrence potential. This phase of work allowed development of a second phase which targeted the high potential areas.

The development of this HARP Plan, and each phase of implementation, was carried out in coordination with the S.C. Department of Archives and History. Initial Plan development was by

Department of Defense staff; later phases have been contracted to consultants. The Plan has a five-year life; this mandates a formal review of the Plan's effectiveness and efficiency.

Proposed Policy: A Cultural Resources Management Plan should be developed for the Charleston Harbor Project watershed area, based on similar plans developed for Federally owned military bases and other lands.

A Cultural Resources Management Plan (CRMP) for the Charleston Harbor Project area could solve most problems inherent in the reactive permitting process. Such a plan could identify major concerns and provide overall guidance for decision makers at various levels in the review process. Specific types or classes of archaeological sites (or historic structures--e.g., Civil War fortifications) could be identified as of major importance within the CHP area; others could be classed as of lesser importance. Specific historic landscapes or viewsheds could be identified (or identification procedures called for), and development limitations within these areas specified in advance so that the private sector can adapt without surprises.

Proposed Policy: The Plan should designate sensitivity areas based on the Department of Archives and History's knowledge of historic sites and with the assistance of the S.C. Institute of Archaeology and Anthropology. Use should be made of the predictive model for terrestrial sites developed for the Charleston Harbor Project by New South Associates, Inc. and the data base prepared for submerged sites by Tidewater Atlantic Research, Inc.

A CRMP for the CHP area could identify high and low potential areas for archaeological site occurrence and prescribe methods for adequate survey of these areas as they are proposed for development. The Charleston Harbor Project has already funded a detailed scientific study which will allow identification of areas within the watershed of high potential for archaeological sites. Underwater archaeological sites/objects whose locations are known in the estuary have also been identified, and areas of high concern for presently unknown shipwrecks and submerged historic sites have been identified. This information would be available in the proposed CRMP.

Proposed Policy: Plan development should begin with high sensitivity/high development potential areas and be extended throughout the watershed as funding allows.

Proposed Policy: The Plan should support ongoing programs to survey (in advance of specific development proposals) areas of high sensitivity and high potential for development.

The CRMP should also identify areas of high potential for development, summarizing economic projections already available. For these areas, detailed resource identification programs would be specified so that these could be carried out in advance of development. Areas of high resource potential would have priority within these zones. State, county, and municipal agency grant studies, as well as surveys by volunteer organizations and university programs, would be encouraged by the plan and prioritized for high sensitivity/high development potential zones.

The CRMP would be a public document which would assist planners in many government and private organizations. The private developers (and their consultants) in the region would benefit greatly from this kind of information; they would have a much better idea of the costs, time constraints, and other concerns for various property tracts and could take these into account early in their decision making process.

Proposed Policy: The Plan should support and promote the development of local academic and scientific research projects and programs focused on the region's rich cultural heritage. Cultural resources management decisions should be coordinated with these programs for maximum effectiveness.

A CRMP would be of great value for coordination of existing research, interpretation, and education programs. The CRMP could highlight significant research needs and encourage university or private work in these areas to supplement or extend the "reactive" studies carried out as part of the permitting process. Interpretation and education programs could be coordinated for maximum efficiency. Aspects of the Pinckney Site park could be interpreted in conjunction with Boone Hall, Drayton Hall, and other plantation sites; Charles Town Landing could focus its interpretive programs so that these are not redundant with others. Areas or topics without appropriate interpretation in the region could be identified (e.g., slave life, Native Americans of various periods, Colonial and Antebellum shipping and merchant life). Effective programs could be developed for these topics, rather than producing additional interpretations of topic already well covered in the region.

Proposed Policy: Existing cultural resources management plans within the watershed (e.g., Naval Weapons Station, Francis Marion National Forest), should be identified and consulted in development of a watershed Plan.

Development of a Cultural Resources Management Plan for the CHP might appear at first to be an overwhelming undertaking, requiring years of work by hundreds of experts (who would bicker endlessly over priorities). This is not necessarily the case, however. As discussed above, a number of federal agencies have developed such plans (for large and small areas), many with complex cultural resources issues. The S.C. Office of Ocean and Coastal Resource Management has developed several Special Area Management Plans (SAMPs) to deal with specific issues within certain critical or fragile areas.

The Upper Ashley River Special Area Management Plan is an excellent example of a CRMP for a restricted area. This SAMP considers the physical protection of historic period archaeological sites, as well as the maintenance of historic viewsheds for Drayton Hall, Middleton Place, and Magnolia Plantation within the Ashley River Historic District. There are restrictions on development, placement of docks in the river, and speed of boat traffic to protect these irreplaceable resources from destruction and degradation.

These previous plans can serve as models for a Charleston Harbor watershed CRMP. Importantly, the plan should begin as a general document, and can be relatively modest. A significant provision of the plan would specify periodic updates and improvements. This would allow changes to reflect shifting priorities over time, improvements in efficiency, and increases as warranted in detail in certain areas or for certain topics.

Proposed Policy: Agencies involved in cultural resources management and in development within the watershed should contribute to the funding necessary to prepare a watershed Cultural Resources Management Plan. A consultant should be contracted to develop the Plan.

Federal, state, county, and municipal agencies which make cultural resources management decisions should share in the funding of the Plan. A state agency such as the Department of Archives and History or OCRM should oversee and manage Plan development. State and local agencies promoting growth and development within the watershed should also contribute to funding for Plan development. Funding should be allocated for periodic updating of the Plan, as programs are accomplished and additional information is available.

An important consideration is "who is to develop such a document?" It is recommended here that the Charleston Harbor Project contract with a consultant experienced in developing such plans. Federal, state, and local government employees with knowledge and experience in cultural resources management have too many demands on their time to undertake such a project. While their opinions and information should be solicited in plan development, it is unwarranted to believe that they would be able to produce a viable plan in a short period of time. Similarly, it would be difficult for university historians and archaeologists, and cultural resources professionals at such organizations as the Historic Charleston Foundation and the National Trust for Historic Preservation, to carry out such a project within a specified time frame. All these professionals, as well as agency representatives and other interested individuals, should, of course, be consulted for ideas and should review draft plans.

Issue #15. Support for Cultural Resources Management Comes from an Educated Citizen Base.

Proposed Policy: Historic properties, including submerged shipwrecks and sites, buildings, districts, landscapes, archaeological sites, and viewsheds should be targeted for interpretation and education programs.

After careful coordination (discussed above) to reduce redundancy and to address topics now lacking, interpretation and education programs should be encouraged. Such efforts could range from placement of signage to inclusion of volunteers in ongoing, professionally supervised, archaeological research (e.g., within state and federal parks). Information regarding history and archaeology can also be made available as books, pamphlets, and brochures. Exhibits and displays (large and small) can be developed for locations outside traditional museum setting, including traveling to schools and to semi-public places such as hotel or office building lobbies. Funding for these programs can come from a variety of sources.

Policy: Interpretation and education programs should be considered as elements in the permitting and review process. Such programs should be considered as mitigation of development impact, similar to scientific study and documentation.

It is important to note that such interpretation and education programs do not have to be carried out only by museums or government agencies (such as park units). Serious consideration should be given to such public programs, exhibits, and other materials as elements of mitigation requirements within cultural resources management programs. In certain circumstances, an exhibit or a public oriented booklet may be a more appropriate mitigation element than detailed building documentation or extensive archaeological data recovery study. The cultural resources management process should consider these options.

Issue: Support for a Program of Cultural Resources Management Also Comes From Support by Permit Applicants.

Permit applicants (primarily land developers) pay much of the cost of cultural resources preservation and mitigation programs. These costs can be high, both in funding needs and in possible time delays. Private developers have been generally supportive of historic resources protection, but continued support is dependent on making preservation programs as efficient and as fair as possible.

Policy: Requirements for resource identification, evaluation, preservation, and mitigation study should be evaluated for efficiency.

A systematic review of needs, goals, and current approaches should be undertaken to reduce as much as possible unnecessary costs. Can survey reports be shortened? Can more productive field (identification and assessment) methods and strategies be implemented? Are truly significant historic properties being tightly focused upon? Can review procedures be streamlined to save time?

Policy: Cultural resources management requirements should be consistently applied to ensure fairness.

A common complaint among developers who must address costly cultural resources management requirements is that other developers were not required to carry out such measures. Some of this problem results from the fact that development areas are different, contain different resources, and should be approached with different programs.

Often too, some proposed developments fall within the permitting process (require a permit or certification), while others do not. This problem would be addressed by increasing review by municipalities and counties.

It should also be recognized that existing regulations, especially as they become out of date, are somewhat subjective and difficult to apply evenly. Existing procedures can become complex, and some permit projects are studied less carefully by reviewers. Review agencies should target consistency as a major goal of their management effort. This will become even more important as additional agencies, at local levels, become involved in the process. An important tool for aiding consistency is the rigorous review of existing requirements and procedures proposed above. A streamlined set of guidelines can be more consistently applied.

Policy: Requirements should be widely publicized to potential permit applicants. This should include development of an informational brochure for permit applicants and the general public.

Developers and other potential permit applicants need to know well in advance what requirements they might face as they consider projects. This information is necessary for proper economic planning and to avoid surprises (in cost or time delays) well into a project.